

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

PICKENS COUNTY BRANCH OF THE NAACP;

REBECCA TURNER and BRANDON TURNER, on
behalf of minor children J.T. and G.T.;

SUSANNA ASHTON and PETER LAURENCE on
behalf of minor children H.L. and C.L.;

REBA KRUSE and DERRICK KRUSE on behalf of
minor children S.K. and R.K.;

Plaintiffs,

v.

SCHOOL DISTRICT OF PICKENS COUNTY;

Defendant.

Case No. 8:23-cv-01736-BHH

**Plaintiffs' Motion for Preliminary
Injunction**

Plaintiffs respectfully move, for the reasons set forth in their attached Memorandum of Law, for the issuance of a preliminary injunction against Defendant's unconstitutional removal of *Stamped: Racism, Antiracism, and You* from every classroom, library, and media center in the School District of Pickens County. Plaintiffs respectfully ask the Court to rule on this Motion before August 1, 2023, when students return to classes.

Specifically, Plaintiffs ask the Court to:

1. Order that all copies of *Stamped: Racism, Antiracism, and You* that were available prior to August 22, 2022, be returned to their previous locations and be made available to students in the District;

2. Enjoin Defendant School District of Pickens County from taking any action to prohibit or discourage the use of *Stamped: Racism, Antiracism, and You* in high school classrooms in the District;

3. Enter any other such relief that the Court deems necessary to protect Plaintiffs from ongoing injury.

Dated: June 26, 2023

Respectfully submitted,

ACLU OF SOUTH CAROLINA

/s Allen Chaney

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* *Pro hac vice applications to be filed*